

**CSReeder, PC**  
TRIAL LAWYERS AND GENERAL COUNSEL

February 13, 2023

The Honorable Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square Room 430  
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

Dear Judge Netburn:

We represent Plaintiff Lynne Freeman in the above-referenced action. We are writing to you regarding your Order dated January 31, 2023 (ECF 118).

The parties have been working together to set a mutually acceptable deposition schedule. In order to accommodate all parties and counsel, it is going to be necessary to use the entire month of March for the depositions.

Defendants do not believe it is necessary to obtain the Court's permission in light of the above referenced Order. However, Plaintiff's counsel wishes to obtain the Court's approval as a precautionary measure. Thus, Plaintiff hereby respectfully requests that the Court move the discovery deadline for the sole purpose of taking depositions to and including March 31, 2023. Defendants' counsel has no objection to the foregoing.

Thank you for your consideration of the above request.

Respectfully submitted,

**CSReeder, PC**



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